

Kami E. Quinn  
Gilbert LLP  
700 Pennsylvania Avenue, SE  
Suite 400  
Washington, DC 20003  
Tele: 202.772.2200  
Fax: 202.772.3333  
Email: quinnk@gilbertlegal.com

*Co-Counsel to the Ad Hoc Committee of  
Governmental and Other Contingent  
Litigation Claimants*

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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<i>In re:</i>	:	
PURDUE PHARMA L.P., <i>et al.</i> ,	:	Chapter 11
	:	Case No. 19-23649 (RDD)
Debtors. <sup>1</sup>	:	(Jointly Administered)
	:	

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**FORTY-THIRD MONTHLY FEE STATEMENT OF GILBERT LLP,  
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND  
REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL TO THE AD HOC  
COMMITTEE OF GOVERNMENTAL AND OTHER CONTINGENT LITIGATION  
CLAIMANTS FOR THE PERIOD APRIL 1, 2023 THROUGH APRIL 30, 2023**

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

<b>Name of Applicant:</b>	<b>Gilbert LLP</b>
<b>Authorized to provide professional services to:</b>	<b>Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants</b>
<b>Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant:</b>	<b>December 2, 2019 (Docket #553)</b>
<b>Period for which compensation and reimbursement is sought:</b>	<b>April 1, 2023 through April 30, 2023</b>
<b>Amount of compensation sought as actual, reasonable, and necessary:</b>	<b>\$172,884.00 (80% of \$216,105.00)</b>
<b>Amount of expense reimbursement sought as actual, reasonable and necessary:</b>	<b>\$9,835.05 (100%)</b>
<b>This is a:</b>	<b>Monthly Fee Statement</b>

Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 365 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals* entered by this Court on December 2, 2019 [Docket #553] (the “**Reimbursement Order**”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket #529] (the “**Procedures Order**”), the law firm of Gilbert LLP (“**Gilbert LLP**”), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the “**AHC**”), hereby submits this forty-third monthly fee statement (the “**Monthly Fee Statement**”) for legal services rendered and reimbursement for expenses incurred for the period commencing April 1, 2023 through April 30, 2023 (the “**Application Period**”).

**Itemization of Services Rendered and Expenses Incurred**

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Application Period by project category. As reflected on Exhibit A, Gilbert LLP incurred \$216,105.00 in fees during the

Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 80% of such fees, totaling \$172,884.00.

2. Annexed hereto as **Exhibit B** is a chart of Gilbert LLP's professionals and paraprofessionals, including title, hourly rate, number of hours billed, and total fees of each attorney and paraprofessional who rendered services to the AHC in connection with these chapter 11 proceedings during the Application Period. The blended hourly rate of the attorneys during the Application Period is \$964.12. The blended hourly rate of paraprofessionals during the Application Period is \$252.50.

3. Annexed hereto as **Exhibit C** is the summary of reasonable and necessary expenses incurred during the Application Period. As reflected on Exhibit C, Gilbert LLP incurred \$4,378.05 in expenses during the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 100% of such expenses, totaling \$4,378.05.

4. Annexed hereto as **Exhibit D** is the summary of reasonable and necessary expenses incurred by Gilbert LLP for retained consulting experts, which have not yet been paid. Pursuant to the retention agreements applicable to these consulting experts, Gilbert LLP is not obligated to actually pay the incurred amounts until those expenses have been approved pursuant to the process mandated by the Procedures Order. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks payment for 100% of such expenses, totaling \$5,457.00. Upon receipt, Gilbert LLP will promptly pay the accrued expenses that are approved.

5. Annexed hereto as **Exhibit E** are the time records of Gilbert LLP for the Application Period, organized by project category with a daily log detailing the time spent by each professional and an itemization of expenses.

**FILING AND SERVICE**

6. This Monthly Fee Statement will be filed and served in accordance with the directives in the Procedures Order.

7. Pursuant to the Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, within 14 days of service of the Monthly Fee Statement, serve via email, to the Notice Parties (as defined in the Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue.

8. If an objection is timely served pursuant to the Procedures Order, the Debtors shall be authorized and directed to pay Gilbert LLP the amount equal to 80% of the fees and 100% of the expenses that are not subject to an objection. Any objection must set forth the precise nature of the objection and the amount at issue. It shall not be sufficient to simply object to all fees and expenses.

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WHEREFORE, Gilbert LLP respectfully requests compensation in the amount of \$172,884.00 (80% of \$216,105.00) and reimbursement of reasonable and necessary expenses incurred in the amount of \$9,835.05 (100%), for a total amount of \$182,719.05 for the Application Period.

Dated: May 25, 2023  
Washington, DC

Respectfully submitted,

**GILBERT LLP**

/s/ Kami E. Quinn

Kami E. Quinn  
700 Pennsylvania Avenue, SE  
Suite 400  
Washington, DC 20003  
Tele: 202.772.2200  
Fax: 202.772.3333  
Email: quinnk@gilbertlegal.com

*Counsel for the Ad Hoc Committee of  
Governmental and Other Contingent  
Litigation Claimants.*

**Exhibit A**  
**Summary of Services by Category**

**SUMMARY OF SERVICES BY PROJECT CATEGORY**

Project Code	Project Category	Hours Billed in Period	Fees for Period
A004	Case Administration	5.1	\$1,147.50
A008	Hearings	0.7	\$1,365.00
A009	Meetings / Communications with AHC	5.8	\$11,310.00
A015	Non-Working Travel (Billed @ 50%)	11.9	\$5,950.00
A019	Plan / Disclosure Statement	1.0	\$1,950.00
A020	Insurance Adversary Proceeding	218.1	\$194,382.50
		<b>242.6</b>	<b>\$216,105.00</b>

**Exhibit B**  
**Summary of Compensation by Professional**

Name of Professional	Position / Year Admitted Practice	Hourly Billing Rate	Hours Billed for Period	Total Fees for Period
Scott D. Gilbert	Special Counsel / District of Columbia - 1979 U.S. Court of Appeals for the District of Columbia – 1980 U.S. Court of International Trade - 1984 U.S. Supreme Court - 1987 U.S. District Court for the District of Columbia – 2008 Cherokee Nation - 2017 U.S. Court of Federal Claims – 2019	\$1,950	7.5	\$14,625.00
Richard Shore	Partner / State of New York – 1988 District of Columbia – 1989 U.S. Court of Appeals for the Third Circuit – 2009 U.S. Court of Appeals for the Fourth Circuit – 2014 U.S. Court of Appeals for the Ninth Circuit – 2014 U.S. Court of Appeals for the Fifth Circuit – 2017 Cherokee Nation – 2017	\$1,600	10.6	\$16,960.00
Richard Leveridge	Partner / State of New York – 1997 District of Columbia – 1981 U.S. Court of Appeals for the District of Columbia – 1981 U.S. District Court for the District of Columbia – 1982 U.S. Supreme Court - 1986 U.S. Court of Appeals for the Fourth Circuit - 1988 U.S. District Court for the E. D. of New York – 1988 U.S. District Court for the S. D. of New York - 1998 U.S. District Court for the District of Maryland – 2000 U.S. Court of Appeals for the Second Circuit - 2020	\$1,600	16.0	\$25,600.00
Jason Rubinstein	Partner / State of Maryland – 2006 District of Columbia – 2007 U.S. District Court for the District of Maryland – 2007 U.S. District Court for the District of Columbia – 2011	\$1,000 \$500 <sup>2</sup>	58.9 11.9	\$58,900.00 \$5,950.00
Jon Dougherty	Of Counsel / State of New York – 2014 U.S. District Court for the S. D. of New York – 2014 District of Columbia – 2016 U.S. District Court for District of Wisconsin – 2017 U.S. Bankruptcy Court for the S. D. of New York – 2022	\$825	28.3	\$23,347.50
Mike Rush	Of Counsel / State of Delaware – 2007 District of Columbia – 2017	\$825	63.2	\$52,140.00
Alison Gaske	Associate / District of Columbia – 2016	\$725	5.7	\$4,132.50
Ifenanya Agwu	Associate / District of Columbia – 2022	\$525	15.5	\$8,137.50
Nick Poz	Paralegal – Joined firm in 2022	\$350	5.5	\$1,925.00
Carmen Turner	Junior Paralegal – Joined firm in 2021	\$225	19.5	\$4,387.50
	<b>Totals</b>		<b>242.6</b>	<b>\$216,105.00</b>
	<b>Attorney Blended Rate</b>		<b>\$964.12</b>	
	<b>Paraprofessional Blended Rate</b>		<b>\$252.50</b>	

<sup>2</sup> Non-working travel is billed @ 50% of regular hourly rates.

**Exhibit C**  
**Summary of Expenses Incurred**

**SUMMARY OF EXPENSES INCURRED**

<b>DESCRIPTION</b>	<b>Total Expenses for Period</b>
Depositions / Transcripts	\$3,616.95
Travel – Lodging	\$269.10
Travel – Meals	\$37.92
Travel – Mileage	\$419.20
Travel – Parking	\$21.27
Travel – Tolls	\$13.61
<b>Total</b>	<b>\$4,378.05</b>

**Exhibit D**

**Summary of Expenses Incurred and Not Yet Paid**

**SUMMARY OF EXPENSES INCURRED BUT NOT YET PAID**

<b>DESCRIPTION</b>	<b>Total Expenses for Period</b>
Insurance Consulting Expert A	\$5,457.00
<b>Total</b>	<b>\$5,457.00</b>

**Exhibit E**  
**Time and Expense Detail**



700 Pennsylvania Avenue, SE  
Suite 400  
Washington, DC 20003  
O 202.772.2200  
F 202.772.3333  
[GilbertLegal.com](http://GilbertLegal.com)

Ad Hoc Committee  
c/o Marshall S. Huebner  
Davis Polk & Wardwell LLP  
450 Lexington Avenue  
New York, NY 10017

May 15, 2023  
Invoice Number: 11330334  
Client Number: 1599  
Tax ID: 52-2283869

**FOR PROFESSIONAL SERVICES RENDERED through April 30, 2023**

**Re: Ad Hoc Committee (Purdue)**

Matter Description	Fees	Costs	Total
Purdue Bankruptcy	216,105.00	4,378.05	220,483.05
<b>Total</b>	<b>216,105.00</b>	<b>4,378.05</b>	<b>220,483.05</b>
	TOTAL FEES		\$ 216,105.00
	TOTAL EXPENSES		<u>\$ 4,378.05</u>
	<b>TOTAL FEES AND EXPENSES</b>		<b>\$ 220,483.05</b>

**FOR PROFESSIONAL SERVICES RENDERED through April 30, 2023****Purdue Bankruptcy****A004: Case Administration**

Name	Date	Services	Hours	Amount
Turner, C.	4/03/23	Review court docket for recently-filed pleadings.	1.50	337.50
Turner, C.	4/10/23	Review court docket for pleadings recently filed in case.	1.30	292.50
Turner, C.	4/17/23	Review court docket for pleadings recently filed in case.	1.00	225.00
Turner, C.	4/24/23	Review court docket for pleadings recently filed in case.	1.30	292.50
<b>Project Total:</b>			<b>5.10</b>	<b>\$ 1,147.50</b>

**A008: Hearings**

Name	Date	Services	Hours	Amount
Gilbert, S.	4/25/23	Attend bankruptcy hearing.	.70	1,365.00
<b>Project Total:</b>			<b>.70</b>	<b>\$ 1,365.00</b>

**A009: Meetings / Communications with AHC**

Name	Date	Services	Hours	Amount
Gilbert, S.	4/13/23	Confer with AHC working group re Plan B strategy.	2.00	3,900.00
Gilbert, S.	4/18/23	Confer with AHC working group re strategy.	.80	1,560.00
Gilbert, S.	4/24/23	Correspond with AHC re strategy (0.8); confer with financial advisors re strategy (0.7).	1.50	2,925.00
Gilbert, S.	4/24/23	Confer with financial advisors re strategy (0.2); review drafts re same (0.3).	.50	975.00
Gilbert, S.	4/25/23	Confer with AHC working group re strategy.	.50	975.00
Gilbert, S.	4/26/23	Confer with financial advisor re strategy.	.50	975.00
<b>Project Total:</b>			<b>5.80</b>	<b>\$ 11,310.00</b>

Invoice Number: 11330334  
May 15, 2023

**A015: Non-Working Travel (Billed @ 50%)**

Name	Date	Services	Hours	Amount
Rubinstein, J.	4/19/23	Travel from Washington, DC to Stamford, CT for D. Merlo deposition.	5.90	2,950.00
Rubinstein, J.	4/20/23	Travel from Stamford, CT to Potomac, MD after D. Merlo deposition.	6.00	3,000.00
		<b>Project Total:</b>	<b>11.90</b>	<b>\$ 5,950.00</b>

**A019: Plan / Disclosure Statement**

Name	Date	Services	Hours	Amount
Gilbert, S.	4/06/23	Confer with PI counsel re Plan B and insurance.	1.00	1,950.00
		<b>Project Total:</b>	<b>1.00</b>	<b>\$ 1,950.00</b>

**A020: Insurance Adversary Proceeding**

Name	Date	Services	Hours	Amount
Shore, R.	4/03/23	Confer with R. Leveridge and J. Rubinstein re status, strategy, next steps.	.80	1,280.00
Rubinstein, J.	4/03/23	Confer with M. Rush and R. Leveridge re deposition strategy (0.4); confer with R. Shore and R. Leveridge re strategy decisions (0.8); correspond with co-counsel re strategy discussions (0.3); review correspondence re service of plaintiff responses to Liberty interrogatories (0.2); review and provide comments on multiple insurer Rule 30(b)(6) letters for responses (1.9); review draft letter from Debtors' to Liberty re production materials (0.2); review summary analysis re Issue #69 (0.3).	4.10	4,100.00
Rush, M.	4/03/23	Confer with R. Leveridge and J. Rubinstein re deposition strategy.	.40	330.00
Rush, M.	4/03/23	Draft response to Insurer #25 letter re Rule 30(b)(6) depositions.	2.40	1,980.00
Leveridge, R.	4/03/23	Confer with J. Rubinstein and M. Rush re deposition strategy.	.40	640.00
Leveridge, R.	4/03/23	Confer with R. Shore and J. Rubinstein re status of outstanding projects and relevant litigation issues.	.80	1,280.00
Leveridge, R.	4/03/23	Communicate with co-counsel re litigation strategy.	.40	640.00
Leveridge, R.	4/03/23	Communicate with co-counsel re discovery issues.	.20	320.00

Invoice Number: 11330334  
May 15, 2023

Name	Date	Services	Hours	Amount
Rubinstein, J.	4/04/23	Correspond with co-counsel re letter to Liberty re discovery (0.2); review summary of recent NY bankruptcy case affirming plan (0.3); review open tasks and case strategy (0.7); analysis re Issue #69 pleading (0.2); update litigation task list (0.9); analysis re additional sets of request for production to Insurers #23 and #33 (0.4); correspond with Debtors' counsel re Navigators stipulation re policy premium (0.1).	2.80	2,800.00
Rush, M.	4/04/23	Draft response to Insurer #25 letter re Rule 30(b)(6) depositions.	2.20	1,815.00
Turner, C.	4/04/23	Review and organize third-party subpoena tracking.	.20	45.00
Agwu, I.	4/04/23	Draft requests for production of documents for Insurer #23.	1.50	787.50
Dougherty, J.	4/04/23	Review deposition transcripts re key issues.	2.20	1,815.00
Rubinstein, J.	4/05/23	Finalize and correspond with co-counsel re Navigators' stipulation (0.6); confer with M. Rush re response letters to multiple insurers re Rule 30(b)(6) depositions (0.5).	1.10	1,100.00
Rush, M.	4/05/23	Review correspondence from insurers re Rule 30(b)(6) depositions.	1.00	825.00
Rush, M.	4/05/23	Confer with J. Rubinstein re Rule 30(b)(6) depositions.	.50	412.50
Leveridge, R.	4/05/23	Review discovery issues (0.3); review communications from co-counsel re same (0.2); review communications with co-counsel re Navigators' stipulation (0.2).	.70	1,120.00
Turner, C.	4/05/23	Review and organize Insurers #18, #19 and #20 response to plaintiffs' document requests.	.20	45.00
Agwu, I.	4/05/23	Continue drafting requests for production of documents for Insurer #23.	1.50	787.50
Agwu, I.	4/05/23	Draft requests for production of documents for Insurer #33.	1.90	997.50
Poz, N.	4/05/23	Update discovery pleadings tracking to include recent filings.	.20	70.00
Poz, N.	4/05/23	Update correspondence tracking to include recent communications with Insurers #19, #23 and #25 counsel.	.40	140.00
Rush, M.	4/06/23	Draft response to Insurer #25 letter re Rule 30(b)(6) depositions.	5.40	4,455.00
Leveridge, R.	4/06/23	Communicate with M. Rush re discovery issues (0.3); review and revise draft letter to insurers re Rule 30(b)(6) deposition topics (0.6).	.90	1,440.00

Invoice Number: 11330334  
May 15, 2023

Name	Date	Services	Hours	Amount
Agwu, I.	4/06/23	Continue drafting requests for production of documents for Insurer #33.	2.60	1,365.00
Dougherty, J.	4/06/23	Continue reviewing deposition transcripts re key issues.	6.60	5,445.00
Rush, M.	4/07/23	Draft response to Insurer #5 letter re Rule 30(b)(6) depositions.	3.10	2,557.50
Rush, M.	4/07/23	Revise response to Insurer #25 letter re Rule 30(b)(6) depositions.	.20	165.00
Rush, M.	4/07/23	Draft response to Insurer #33 letter re Rule 30(b)(6) depositions.	1.80	1,485.00
Rush, M.	4/07/23	Draft response to Insurer #24 letter re Rule 30(b)(6) depositions.	1.00	825.00
Agwu, I.	4/07/23	Complete drafting requests for production of documents for Insurers #23 and #33.	2.50	1,312.50
Dougherty, J.	4/07/23	Continue reviewing deposition transcripts re key issues in case.	2.40	1,980.00
Rubinstein, J.	4/08/23	Review correspondence from AHC co-counsel (0.4); review correspondence from Insurer #33 re discovery issues (0.1); correspond with I. Agwu re draft targeted supplemental requests for production (0.2).	.70	700.00
Shore, R.	4/10/23	Confer with R. Leveridge and J. Rubinstein re pending projects, strategy, and next steps.	.40	640.00
Shore, R.	4/10/23	Analysis re case management issues.	.70	1,120.00
Shore, R.	4/10/23	Confer with co-counsel re pending matters, including discovery, discussions with insurers, and other projects.	.40	640.00
Rubinstein, J.	4/10/23	Confer with R. Shore and R. Leveridge re strategy (0.4); revise collection of Rule 30(b)(6) related response letters to multiple insurers (3.1); revise request for production sets to multiple insurers (1.8); review AHC correspondence (0.2); participate in co-counsel call re strategy (0.4).	5.90	5,900.00
Rush, M.	4/10/23	Continue drafting response to Insurer #24 letter re Rule 30(b)(6) depositions.	.60	495.00
Rush, M.	4/10/23	Continue drafting response to Insurer #25 letter re Rule 30(b)(6) depositions.	.70	577.50
Gaske, A.	4/10/23	Review discovery materials produced by Insurer #33.	.30	217.50
Leveridge, R.	4/10/23	Confer with R. Shore and J. Rubinstein re status of case and related matters (0.4); review discovery issues (0.5).	.90	1,440.00
Leveridge, R.	4/10/23	Confer with co-counsel re pending projects.	.40	640.00

Invoice Number: 11330334  
May 15, 2023

Name	Date	Services	Hours	Amount
Rubinstein, J.	4/11/23	Revise request for production sets to multiple insurers (1.5); communicate with Consulting Expert A re analysis (0.1); revise letters to multiple insurers re Rule 30(b)(6) depositions (3.6).	5.20	5,200.00
Rush, M.	4/11/23	Revise responses to insurers' letter re Rule 30(b)(6) depositions.	5.80	4,785.00
Rush, M.	4/11/23	Review materials in preparation for deposition of Deponent #16.	1.00	825.00
Gaske, A.	4/11/23	Correspond with M. Rush re status of policy stipulations for inclusion in Rule 30(b)(6) letters.	.10	72.50
Poz, N.	4/11/23	Organize co-plaintiffs' 49th supplemental production.	.40	140.00
Dougherty, J.	4/11/23	Continue reviewing deposition transcripts re key issues.	4.40	3,630.00
Rush, M.	4/12/23	Revise responses to insurers' letter re Rule 30(b)(6) depositions.	3.90	3,217.50
Rush, M.	4/12/23	Research issues re Issue #14.	.80	660.00
Gaske, A.	4/12/23	Analyze Insurer #33 discovery materials.	.30	217.50
Dougherty, J.	4/12/23	Continue revising deposition transcripts for key issues in case.	2.70	2,227.50
Rush, M.	4/13/23	Draft letter to Insurers #15 and #27 re Rule 30(b)(6) issues.	.40	330.00
Rush, M.	4/13/23	Research re Issue #15.	1.20	990.00
Dougherty, J.	4/13/23	Continue review of deposition transcripts to identify key issues.	3.20	2,640.00
Shore, R.	4/14/23	Communicate with A. Gaske re Insurer #12.	.10	160.00
Rubinstein, J.	4/14/23	Revise draft letters to multiple insurers re Rule 30(b)(6) depositions (2.0); correspond with A. Gaske re Insurer #33 discovery materials (0.2); correspond with co-counsel re Liberty policy stipulation (0.1); review correspondence from AHC co-counsel (0.2); correspond with co-counsel and National Union counsel re policy stipulation (0.2); update litigation task list (0.6).	3.30	3,300.00
Rush, M.	4/14/23	Review materials in preparation for deposition of Deponent #16.	3.80	3,135.00
Rush, M.	4/14/23	Revise letter to Insurers #15 and #27 re Rule 30(b)(6) notice.	.10	82.50
Rush, M.	4/14/23	Revise letter to Insurer #33 re Rule 30(b)(6) notice.	.40	330.00
Rush, M.	4/14/23	Revise letter to Insurer #24 re Rule 30(b)(6) notice.	.60	495.00
Rush, M.	4/14/23	Revise response to Insurer #25 letter re Rule 30(b)(6) depositions.	.60	495.00

Invoice Number: 11330334  
May 15, 2023

Name	Date	Services	Hours	Amount
Rush, M.	4/14/23	Revise response to Insurer #5 letter re Rule 30(b)(6) depositions.	.30	247.50
Gaske, A.	4/14/23	Review National Union policy pages spreadsheet (0.2); draft stipulation to National Union (0.3).	.50	362.50
Gaske, A.	4/14/23	Confer with counsel for insurer re privilege log (0.1); correspond with J. Rubinstein re same (0.3).	.40	290.00
Turner, C.	4/14/23	Revise plaintiffs' request for production and exhibits for Insurers #20, #29, and #33.	1.10	247.50
Poz, N.	4/14/23	Cite-check letter to Insurers #9 and #25 re Rule 30(b)(6) depositions.	1.40	490.00
Poz, N.	4/14/23	Cite-check letter to Insurers #5 and #36 re Rule 30(b)(6) depositions.	.80	280.00
Shore, R.	4/17/23	Confer with R. Leveridge and J. Rubinstein re status, strategy, and next steps (0.8); analysis of options re case management issues (0.6).	1.40	2,240.00
Rubinstein, J.	4/17/23	Correspond with team re discovery correspondence (0.4); analysis re finalizing and serving addition request for production re Insurers #18, #19, #20, #23, and #33 (1.5); review correspondence re National Union policy stipulation (0.1); confer with R. Shore and R. Leveridge re strategy (0.8); preparation for Deponent #19 deposition (0.7); review updated deposition schedule chart (0.1); review recent decision relevant to matter (0.3); analysis re case strategy (0.3).	4.20	4,200.00
Rush, M.	4/17/23	Finalize letters to Insurer #5 and #25 re Rule 30(b)(6) objections.	.60	495.00
Rush, M.	4/17/23	Review supplemental requests for production to Insurers #18, #19, #20, #23, and #33.	.50	412.50
Leveridge, R.	4/17/23	Confer with R. Shore and J. Rubinstein re outstanding projects and issues to discuss with co-counsel.	.80	1,280.00
Leveridge, R.	4/17/23	Review discovery issues.	.70	1,120.00
Leveridge, R.	4/17/23	Review communication from insurer counsel re case management issues (0.4); communicate with Debtors' counsel re same (0.5).	.90	1,440.00
Leveridge, R.	4/17/23	Review communications between A. Crawford and R. Shore re strategic issues.	.20	320.00
Leveridge, R.	4/17/23	Review communications between Debtors' counsel and J. Rubinstein re upcoming deposition.	.30	480.00
Turner, C.	4/17/23	Revise Insurer #33 Rule 30(b)(6) topics letter.	3.50	787.50
Turner, C.	4/17/23	Review and organize Rule 30(b)(6) topics letters for Insurers #5, #25, and #33.	.20	45.00

Invoice Number: 11330334  
May 15, 2023

Name	Date	Services	Hours	Amount
Poz, N.	4/17/23	Cite-check letter to Insurer #24 re Rule 30(b)(6) deposition.	.90	315.00
Poz, N.	4/17/23	Finalize and serve requests for production of documents to certain insurers.	.40	140.00
Shore, R.	4/18/23	Confer with A. Kramer and R. Leveridge re Issue #69.	.70	1,120.00
Shore, R.	4/18/23	Review P. Breene response to insurers re case management.	.50	800.00
Rubinstein, J.	4/18/23	Review request for production to Insurers #18, #19, #20, #23, and #33 (0.3); communicate with M. Rush re Insurer #25 Rule 30(b)(1) deposition preparation (0.2); communicate with Consulting Expert A and R. Leveridge re analysis (0.6); confer with Debtors' counsel, R. Shore and R. Leveridge re strategy (0.7); review follow up tasks from same (0.2); communicate with paralegal team re deposition/scheduling logistics (0.2); review correspondence re Issue #69 (0.4); review Debtors' draft email to insurers re case management (0.3).	2.90	2,900.00
Rush, M.	4/18/23	Finalize letters to Insurers #15, #24 and #33 re Rule 30(b)(6) objections.	.90	742.50
Leveridge, R.	4/18/23	Review communication from opposing counsel re case management issues (0.2); confer with Debtors' counsel, R. Shore and J. Rubinstein re responding to same (0.7); review communications re Issue #69 (0.3).	1.20	1,920.00
Leveridge, R.	4/18/23	Communicate with Consulting Expert A and J. Rubinstein re project status.	.30	480.00
Leveridge, R.	4/18/23	Review and provide comments to draft communication to opposing counsel from co-counsel.	.80	1,280.00
Turner, C.	4/18/23	Revise Insurer #15, #33, #24, and #27 re Rule 30(b)(6) letters.	.20	45.00
Shore, R.	4/19/23	Analysis re Issue #69.	.70	1,120.00
Rubinstein, J.	4/19/23	Review materials in preparation for Deponent #19 deposition (0.5); review draft letter to insurers re Leopold claim reservation of rights (0.2); confer with N. Poz re calendaring deadlines (0.2); review correspondence from Debtors' counsel re Issue #69 (0.1).	1.20	1,200.00
Rush, M.	4/19/23	Review materials in preparation for deposition of Deponent #16.	2.70	2,227.50
Leveridge, R.	4/19/23	Communicate with co-counsel re discovery and strategy issues.	.60	960.00

Invoice Number: 11330334  
May 15, 2023

Name	Date	Services	Hours	Amount
Poz, N.	4/19/23	Update discovery pleadings tracker to include recent discovery requests to certain insurers.	.20	70.00
Dougherty, J.	4/19/23	Continue review of deposition transcripts for key issues in case.	2.80	2,310.00
Shore, R.	4/20/23	Confer with co-counsel re stay.	1.00	1,600.00
Rubinstein, J.	4/20/23	Review AHC co-counsel communications (0.2); attend D. Merlo deposition (8.2); confer with counsel post deposition (0.6).	9.00	9,000.00
Rush, M.	4/20/23	Continue reviewing materials in preparation for deposition of Deponent #16.	3.60	2,970.00
Rubinstein, J.	4/21/23	Communicate with team re follow up to D. Merlo deposition (0.5); confer with R. Leveridge re strategy and multiple open projects (0.9); review correspondence from Debtors' counsel re privilege logs (0.1); investigate case management issues (0.2).	1.70	1,700.00
Rush, M.	4/21/23	Continue reviewing materials in preparation for deposition of Deponent #16.	1.80	1,485.00
Leveridge, R.	4/21/23	Communicate with J. Rubinstein re deposition of Deponent #19.	.80	1,280.00
Poz, N.	4/21/23	Review and organize recent discovery communications with Insurers #5, #9, #24, #25, #27, #35 and #36.	.30	105.00
Shore, R.	4/24/23	Confer with R. Leveridge and J. Rubinstein re status, strategy, and next steps.	.50	800.00
Rubinstein, J.	4/24/23	Confer with R. Leveridge and R. Shore re strategy / tasks (0.5); communicate with paralegal team re Deponent #19 deposition (0.1); review article (0.3); review omnibus hearing agenda (0.3); revise deposition outline for Deponent #16 (4.9).	6.10	6,100.00
Leveridge, R.	4/24/23	Confer with R. Shore and J. Rubinstein re strategy (0.5); communicate with co-counsel re strategy issues (0.4).	.90	1,440.00
Leveridge, R.	4/24/23	Review Liberty third-party subpoena.	.40	640.00
Turner, C.	4/24/23	Review and organize Deponent #19 deposition transcripts.	.50	112.50
Turner, C.	4/24/23	Review and organize third-party subpoena from Liberty.	.30	67.50
Rubinstein, J.	4/25/23	Review co-counsel correspondence re omnibus hearing (0.3); correspond with co-counsel re policy stipulations (0.5); confer with co-counsel re case management (0.8); analysis re same (0.8); revise draft correspondence to Insurer #24 re discovery issues (0.8).	3.20	3,200.00

Invoice Number: 11330334  
May 15, 2023

Name	Date	Services	Hours	Amount
Rush, M.	4/25/23	Draft response to Insurer #25 letter.	2.80	2,310.00
Rush, M.	4/25/23	Review materials in preparation for deposition of Deponent #16.	2.70	2,227.50
Rush, M.	4/25/23	Confer with co-counsel re strategy.	.80	660.00
Gaske, A.	4/25/23	Correspond with various insurers and co-counsel re status of policy stipulations.	.60	435.00
Leveridge, R.	4/25/23	Review issues in preparation for call with co-counsel (0.5); confer with co-counsel re case management strategy (0.8).	1.30	2,080.00
Turner, C.	4/25/23	Revise stipulation with Liberty re policies.	1.40	315.00
Poz, N.	4/25/23	Organize recent correspondence with Insurer #25.	.20	70.00
Poz, N.	4/25/23	Review and organize interrogatories to plaintiffs served by all defendants.	.30	105.00
Dougherty, J.	4/25/23	Review deposition transcripts re key issues in case.	2.20	1,815.00
Shore, R.	4/26/23	Communicate with J. Rubinstein and R. Leveridge re letter from Debtors' counsel.	.30	480.00
Rubinstein, J.	4/26/23	Confer with M. Rush re deposition outline for Deponent #16 and discovery correspondence (0.4); correspond with team re policy stipulation project (0.2); review letter to 2nd Circuit re status of appeal (0.1); revise draft letter to Chambers re requested conference and review comments from co-plaintiffs (0.4); review third set of interrogatories to plaintiffs (0.3); review third-party subpoena served by Liberty (0.3).	1.60	1,600.00
Rush, M.	4/26/23	Confer with J. Rubinstein re depositions and discovery.	.40	330.00
Rush, M.	4/26/23	Revise letter to Insurer #25 re discovery issues.	.70	577.50
Rush, M.	4/26/23	Review documents and relevant materials in preparation for deposition of Deponent #16.	4.70	3,877.50
Gaske, A.	4/26/23	Correspond with C. Turner re Liberty policy stipulation.	.20	145.00
Leveridge, R.	4/26/23	Review letter from Debtors' counsel re case management issues (0.3); communicate with R. Shore and J. Rubinstein re same (0.3); communicate with co-counsel re same (0.2).	.80	1,280.00
Turner, C.	4/26/23	Continue to revise stipulation with Liberty re insurance policies.	5.20	1,170.00
Dougherty, J.	4/26/23	Continue reviewing deposition transcripts re key issues.	1.80	1,485.00
Shore, R.	4/27/23	Confer with J. Rubinstein and R. Leveridge re scheduling issue and communications to court and insurer counsel.	.70	1,120.00

Invoice Number: 11330334  
May 15, 2023

Name	Date	Services	Hours	Amount
Rubinstein, J.	4/27/23	Correspond with co-counsel re letter to Court re case management (0.7); correspond with insurer counsel re same (0.5); review materials in preparation for Deponent #16 deposition (0.8); confer with co-counsel re strategy (0.2); confer with R. Shore re strategy (0.7); review status of Liberty policy stipulation project (0.2); update litigation task list (0.4); review insurer correspondence re Debtors' production of requested privilege logs (0.1).	3.60	3,600.00
Rush, M.	4/27/23	Revise letter to counsel for Insurer #24 re document productions.	.20	165.00
Gaske, A.	4/27/23	Review revisions to Liberty policy stipulation.	2.10	1,522.50
Leveridge, R.	4/27/23	Confer with R. Shore and J. Rubinstein re case management issue, communications to Court and insurer counsel re same (0.7); communicate with Debtors' counsel re same (0.2).	.90	1,440.00
Shore, R.	4/28/23	Review draft letter to Court re stay (0.3); confer with J. Rubinstein re same (0.1); communicate with S. Gilbert re same (0.3).	.70	1,120.00
Shore, R.	4/28/23	Review schedule issues.	.40	640.00
Shore, R.	4/28/23	Confer with J. Rubinstein, R. Leveridge, and M. Rush re Issue #34	1.30	2,080.00
Rubinstein, J.	4/28/23	Review portions of D. Merlo transcript (0.8); review materials in preparation for deposition of Deponent #16 (1.2); correspond with team re case management (0.1); correspond with team re deposition summary of Deponent #19 (0.2).	2.30	2,300.00
Rush, M.	4/28/23	Review deposition outline and materials in preparation for deposition of Deponent #16.	1.30	1,072.50
Rush, M.	4/28/23	Confer with R. Shore, R. Leveridge and J. Rubinstein re Issue #34.	1.30	1,072.50
Gaske, A.	4/28/23	Revise Liberty stipulation.	1.20	870.00
Leveridge, R.	4/28/23	Communicate with P. Breene re case management issues.	.40	640.00
Turner, C.	4/28/23	Finalize revisions to stipulation with Liberty re insurance policies.	1.60	360.00
Agwu, I.	4/28/23	Begin summarizing Deponent #19 deposition. Project Total:	5.50	2,887.50
			218.10	\$ 194,382.50

**TOTAL CHARGEABLE HOURS** **242.60**

**TOTAL FEES** **\$ 216,105.00**

Invoice Number: 11330334  
May 15, 2023

## TIMEKEEPER SUMMARY

Timekeeper	Hours	Rate	Total
Gilbert, S.	7.50	1,950.00	14,625.00
Shore, R.	10.60	1,600.00	16,960.00
Rubinstein, J.	11.90	500.00	5,950.00
Rubinstein, J.	58.90	1,000.00	58,900.00
Rush, M.	63.20	825.00	52,140.00
Gaske, A.	5.70	725.00	4,132.50
Leveridge, R.	16.00	1,600.00	25,600.00
Turner, C.	19.50	225.00	4,387.50
Agwu, I.	15.50	525.00	8,137.50
Poz, N.	5.50	350.00	1,925.00
Dougherty, J.	28.30	825.00	23,347.50
<b>TOTALS</b>	<b>242.60</b>		<b>\$ 216,105.00</b>

## TASK SUMMARY

Task	Description	Hours	Amount
A004	Case Administration	5.10	1,147.50
A008	Hearings	.70	1,365.00
A009	Meetings / Communications with AHC	5.80	11,310.00
A015	Non-Working Travel (Billed @ 50%)	11.90	5,950.00
A019	Plan / Disclosure Statement	1.00	1,950.00
A020	Insurance Adversary Proceeding	218.10	194,382.50

## EXPENSE DETAILS

### E110: Out-of-Town Travel

Date	Description	Task	Amount
4/20/23	Travel - Mileage / Jason Rubinstein / Stamford, CT / D. Merlo Purdue Deposition / 04.19-20.2023	E110	419.20
4/20/23	Travel - Tolls / Jason Rubinstein / Stamford, CT / D. Merlo Purdue Deposition / 04.19-20.2023	E110	13.61
4/20/23	Travel - Parking / Jason Rubinstein / Stamford, CT / D. Merlo Purdue Deposition / 04.19-20.2023	E110	21.27
4/20/23	Travel - Lodging / Jason Rubinstein / Stamford, CT / D. Merlo Purdue Deposition / 04.19-20.2023	E110	269.10
4/20/23	Travel - Meals / Jason Rubinstein / Stamford, CT / D. Merlo Purdue Deposition / 04.19-20.2023	E110	37.92
<b>Sub-Total of Expenses:</b>			<b>\$ 761.10</b>

Invoice Number: 11330334  
May 15, 2023

**E115: Deposition Transcripts**

Date	Description	Task	Amount
2/07/23	Deposition/Transcript - Veritext / Transcript of M. Thomas Deposition	E115	1,549.65
3/01/23	Deposition/Transcript - Veritext / Videography Deposition of E. Osborne	E115	736.00
3/02/23	Deposition/Transcript - Veritext / Transcript of P. Morin Deposition	E115	1,331.30
<b>Sub-Total of Expenses:</b>			<b>\$ 3,616.95</b>
<b>TOTAL EXPENSES</b>			<b>\$ 4,378.05</b>
<b>TOTAL FEES AND EXPENSES</b>			<b>\$ 220,483.05</b>